

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
DIVISION

Tera Ann Hanes
(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:22-cv-01739-MK
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Justice Center Multnomah Jury Trial Demanded
County Jail, Sheriff's Office Yes No
Multnomah County Sheriff's Office et. al
(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Tera Ann Hanes 89602

Street Address: 1120 SW Third Ave

City, State & Zip Code: Portland, Oregon 97204

Telephone No.: _____

Justice Center

Defendant No. 1

Name: Multnomah County Detention Center
Street Address: 1120 SW Third ave
City, State & Zip Code: Portland Oregon 97204
Telephone No.: 503 988-3662

Defendant No. 2

Name: Multnomah County Sheriff Office
Street Address: 1120 SW Third ave
City, State & Zip Code: Portland Oregon 97204
Telephone No.: 503 988-3660

Defendant No. 3

Name: Sgt Fernaly
Street Address: 1120 SW Third ave
City, State & Zip Code: Portland Oregon 97204
Telephone No.: 503 988-3660

Defendant No. 4

Name: Sgt Siekerich
Street Address: 1120 SW Third ave
City, State & Zip Code: Portland Oregon 97204
Telephone No.: 503 988-3660

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

- Federal officials (a *Bivens* claim)
 State or local officials (a § 1983 claim)

Continued ^{cont'd}

Deputy Park 1120 SW Third Ave Portland Oregon
Deputy Reid " "
Deputy Lovejoy " "
Deputy Langdon " "
Deputy Mechanic " "
Counselor Drake " "
Deputy Jones " "

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

42. USC 1983 act and the 1986 act
My 4, 6, 8, 14 amendment

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

There has been excessive force placed on
me which has endangered my health
and has cause me to be in severe
pain in my shoulder, my neck, and
my spine. There are permanent bruises
on my feet from Sgt. Tornay trying
to break my feet and I have been given
no medical treatment because of
retaliation and discrimination because
I am a African American Woman

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

I have been placed on disciplinary
punishment that I never had hearings

for and placed on segregation for days
I did not have from over excessive
practices due to retaliation and
discrimination

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

The faculty have not let me
see or visit with my family
members in person or video visits
for about a year for reasons
unknown to me but for retaliation
and discrimination

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

Yes No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I would like 75000,00 in damages
for bodily damages and no medical
treatment has been given to me and
being locked in my cell without being
able to walk debilitating me more
and not letting me see my family at
video visits, and in person visits causing
stress to me and my family, mental anguish
emotional stress, fear, intimidation, emotional anguish
mental stress and injury and permanent bruising

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3 day of November, 2022


(Signature of Plaintiff)